

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

HANS MOKE NIEMANN,

Plaintiff,

vs.

SVEN MAGNUS ØEN CARLSEN A/K/A
MAGNUS CARLSEN, PLAY MAGNUS AS
D/B/A PLAY MAGNUS GROUP, CHESS.COM,
LLC, DANIEL RENSCH A/K/A “DANNY”
RENSCH, AND HIKARU NAKAMURA,

Defendants.

Case No. 4:22-cv-01110-AGF

Hon. Audrey G. Fleissig

**DEFENDANT DANIEL “DANNY” RENSCH’S MOTION TO DISMISS PLAINTIFF’S
AMENDED COMPLAINT**

Nima H. Mohebbi (# 275453CA)
Sarah F. Mitchell (# 308467CA)
Michael A. Hale (# 319056CA)
LATHAM & WATKINS LLP
355 S. Grand Ave., Suite 100
Los Angeles, CA 90071
Tel: (213) 485-1234
nima.mohebbi@lw.com
sarah.mitchell@lw.com
michael.hale@lw.com

Jeffrey B. Jensen (# 46745MO)
Kate Ledden (# 66026MO)
HUSCH BLACKWELL LLP
190 Carondelet Plaza, Suite 600
St. Louis, MO 63105
Tel: (314) 480 1500
jeff.jensen@huschblackwell.com
kate.ledden@huschblackwell.com

Jamie L. Wine (# 4529251NY)
Blake E. Stafford (# 888324775DC)
LATHAM & WATKINS LLP
1271 Avenue of the Americas
New York, NY 10020
Tel: (212) 906-1200
jamie.wine@lw.com
blake.stafford@lw.com

Derek Teeter (# 59031MO)
Spencer Tolson (# 74467MO)
HUSCH BLACKWELL LLP
4801 Main, Suite 1000
Kansas City, MO 64112
Tel: (816) 983-8000
derek.teeter@huschblackwell.com
spencer.tolson@huschblackwell.com

Counsel for Defendant Daniel “Danny” Rensch

COMES NOW Defendant Daniel “Danny” Rensch, by and through his undersigned attorneys, and moves this Court pursuant to Federal Rule of Civil Procedure 12(b)(2) and (6) and Connecticut’s anti-Strategic Lawsuits Against Public Participation (“anti-SLAPP”) statute, Conn. Gen. Stat. § 52-196a, to dismiss the Amended Complaint (“AC”) [ECF #20] of Plaintiff Hans Moke Niemann for lack of personal jurisdiction and failure to state a claim upon which relief may be granted. As more fully set forth in the accompanying Memorandum of Law in Support:

1. The AC fails to allege facts sufficient to establish this Court’s general or specific personal jurisdiction over Rensch under the Due Process Clause of the U.S. Constitution and the Missouri Long Arm Statute. Therefore, the Court should dismiss Rensch for lack of personal jurisdiction.

2. The AC also fails to state a claim against Rensch as a matter of law for the reasons discussed in Defendants Chess.com, LLC’s and Magnus Carlsen’s concurrently filed motions to dismiss and accompanying memoranda of law in support, which arguments Rensch joins in and incorporates by reference herein. Therefore, the Court should dismiss the AC’s Counts I, II, III, IV, and V against Rensch for failure to state a claim.

Wherefore, Rensch respectfully requests that this Court grant this motion and dismiss the claims against him (Counts I through V) and grant any further and necessary relief, including attorneys’ fees and costs as may be allowed by law. The motion is based upon this motion, the accompanying Memorandum of Law in Support of the motion, Chess.com’s and Magnus Carlsen’s motions to dismiss and accompanying memoranda of law in which Rensch joins and incorporates by reference herein, and all pleadings in this action, as well as other writing and oral argument the Court may entertain.

DATED: December 2, 2022

Respectfully submitted,

/s/ Nima H. Mohebbi

Nima H. Mohebbi (# 275453CA)
Sarah F. Mitchell (# 308467CA)
Michael A. Hale (# 319056CA)
LATHAM & WATKINS LLP
355 S. Grand Ave., Suite 100
Los Angeles, CA 90071
Tel: (213) 485-1234
nima.mohebbi@lw.com
sarah.mitchell@lw.com
michael.hale@lw.com

/s/ Jeffrey B. Jensen

Jeffrey B. Jensen (# 46745MO)
Kate Ledden (# 66026MO)
HUSCH BLACKWELL LLP
190 Carondelet Plaza, Suite 600
St. Louis, MO 63105
Tel: (314) 480 1500
jeff.jensen@huschblackwell.com
kate.ledden@huschblackwell.com

/s/ Jamie L. Wine

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LATHAM & WATKINS LLP
1271 Avenue of the Americas
New York, NY 10020
Tel: (212) 906-1200
jamie.wine@lw.com
blake.stafford@lw.com

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spencer.tolson@huschblackwell.com

Counsel for Defendant Daniel "Danny" Rensch

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 2, 2022, the foregoing document was served on all counsel of record by ECF.

DATED: December 2, 2022

/s/ Nima H. Mohebbi

Nima H. Mohebbi (# 275453CA)

Attorney for Defendant Daniel “Danny” Rensch

LATHAM & WATKINS LLP

355 S. Grand Ave., Suite 100

Los Angeles, CA 90071

Tel: (213) 485-1234